



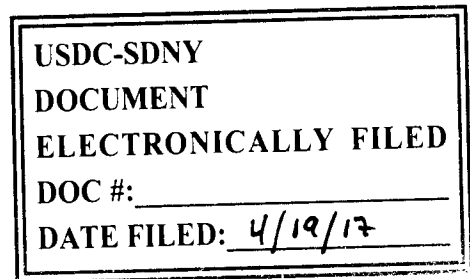
U.S. Department of Justice
Civil Division
Federal Programs Branch
20 Massachusetts Ave, N.W.
Washington, DC 20530

April 19, 2017

MEMO ENDORSED

VIA ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007



Re: *Citizens for Responsibility and Ethics in Washington, et al. v. Trump*,
Civil Action No. 1:17-cv-00458-RA

Dear Judge Abrams:

On February 17, 2017, this Court adopted the parties' proposed briefing schedule for the Defendant's anticipated dispositive motion. Under that schedule, the Defendant's dispositive motion would be due on April 21, 2017. On April 18, 2017, the Complaint was substantially amended to add two new plaintiffs as well as a claim under the Presidential Compensation Clause of the Constitution, U.S. Const. art. II, cl. 7, among many other new allegations. Under Federal Rule of Civil Procedure 15(a)(3), the Defendant's deadline for responding to the Amended Complaint is May 2, 2017. The parties believe that due to the substantial amendment and the significance of the issues, a longer briefing schedule is warranted. Accordingly, the parties respectfully propose the following schedule:

Defendant's Dispositive Motion will be due on June 2, 2017

Plaintiffs' Response to any Dispositive Motion will be due on July 14, 2017

Defendant's Reply will be due on August 11, 2017

Respectfully submitted

Norman L. Eisen
Noah Bookbinder
CREW
455 Massachusetts Avenue, N.W.
Washington, D.C. 20001

Deepak Gupta
Gupta Wessler
1735 20th Street, NW
Washington, D.C. 20009

/s/ Joseph M. Sellers
Joseph M. Sellers
Cohen Milstein Sellers & Toll, PLLC
1100 New York Avenue, N.W.
Washington, D.C. 20005

Counsel for the Plaintiffs

CHAD A. READLER
Acting Assistant Attorney General
Civil Division

JENNIFER D. RICKETTS
Branch Director, Federal Programs Branch

ANTHONY J. COPPOLINO
Deputy Director

/s/ Jean Lin
JEAN LIN
JAMES R. POWERS
U.S. Department of Justice
Civil Division,
Federal Programs Branch
20 Massachusetts Ave., NW
Washington, DC 20530

Counsel for the Defendant

APPLICATION GRANTED
SO ORDERED.



RONNIE ABRAMS, U.S.D.J.

4-19-17